



State of Utah

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Environmental Quality

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11841

Title V Operating Permit

PERMIT NUMBER: 500093002

DATE OF PERMIT: March 6, 2008

Date of Last Revision: March 6, 2008

This Operating Permit is issued to, and applies to the following:

Name of Permittee:

Pepperidge Farm Incorporated.
901 North 200 West
Richmond UT 84333-1499

Permitted Location:

Pepperidge Farm Bakery
901 North 200 West
Richmond UT 84333-1499

UTM coordinates: 432484 m Easting, 4643210 m Northing
SIC code: 2051 (Bread & Other Bakery Products, Except Cookies & Crackers)

UTAH AIR QUALITY BOARD

By:

Prepared By:

M. Cheryl Heying, Executive Secretary

Robert Grandy

ENFORCEABLE DATES AND TIMELINES

The following dates or timeframes are referenced in
Section I: General Provisions of this permit.

Annual Certification Due: June 25 and on that date of every calendar year that this permit is in force.

Renewal application due: October 6, 2012

Permit expiration date: March 6, 2013

Definition of “prompt”: written notification within 14 days.

ABSTRACT

Pepperidge Farm is a commercial food products manufacturer located in Richmond, Utah. The operation is a major source for volatile organic compounds (VOC), primarily ethanol. Emissions from Bakery Line 5 are controlled by a catalytic oxidizer which is subject to the monitoring requirements of 40 CFR Part 64. Pepperidge Farm is located in Cache County, an attainment area for all pollutants.

OPERATING PERMIT HISTORY

Permit/Activity	Date Issued	Recorded Changes
Title V renewal application (Project #OPP0118410004)	3/6/2008	Additions: Permit renewal and revision of Catalytic Oxidizer monitoring for compliance with CAM requirements.
Title V initial application (Project #OPP0118410001)	6/25/2002	

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Issued under authority of Utah Code Ann. Section 19-2-104 and 19-2-109.1, and in accordance with Utah Administrative Code R307-415 Operating Permit Requirements.

All definitions, terms and abbreviations used in this permit conform to those used in Utah Administrative Code R307-101 and R307-415 (Rules), and 40 Code of Federal Regulations (CFR), except as otherwise defined in this permit. Unless noted otherwise, references cited in the permit conditions refer to the Rules.

Where a permit condition in Section I, General Provisions, partially recites or summarizes an applicable rule, the full text of the applicable portion of the rule shall govern interpretations of the requirements of the rule. In the case of a conflict between the Rules and the permit terms and conditions of Section II, Special Provisions, the permit terms and conditions of Section II shall govern except as noted in Provision I.M, Permit Shield.

SECTION I: GENERAL PROVISIONS

I.A Federal Enforcement.

All terms and conditions in this permit, including those provisions designed to limit the potential to emit, are enforceable by the EPA and citizens under the Clean Air Act of 1990 (CAA) except those terms and conditions that are specifically designated as "State Requirements". (R307-415-6b)

I.B Permitted Activity(ies).

Except as provided in R307-415-7b(1), the permittee may not operate except in compliance with this permit. (See also Provision I.E, Application Shield)

I.C Duty to Comply.

- I.C.1 The permittee must comply with all conditions of the operating permit. Any permit noncompliance constitutes a violation of the Air Conservation Act and is grounds for any of the following: enforcement action; permit termination; revocation and reissuance; modification; or denial of a permit renewal application. (R307-415-6a(6)(a))
- I.C.2 It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. (R307-415-6a(6)(b))
- I.C.3 The permittee shall furnish to the Executive Secretary, within a reasonable time, any information that the Executive Secretary may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Executive Secretary copies of records required to be kept by this permit or, for information claimed to be confidential, the permittee may furnish such records directly to the EPA along with a claim of confidentiality. (R307-415-6a(6)(e))
- I.C.4 This permit may be modified, revoked, reopened, and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance shall not stay any permit condition, except as provided under R307-415-7f(1) for minor permit modifications. (R307-415-6a(6)(c))

I.D Permit Expiration and Renewal.

I.D.1 This permit is issued for a fixed term of five years and expires on the date shown under "Enforceable Dates and Timelines" at the front of this permit. (R307-415-6a(2))

I.D.2 Application for renewal of this permit is due on or before the date shown under "Enforceable Dates and Timelines" at the front of this permit. An application may be submitted early for any reason. (R307-415-5a(1)(c))

I.D.3 An application for renewal submitted after the due date listed in I.D.2 above shall be accepted for processing, but shall not be considered a timely application and shall not relieve the permittee of any enforcement actions resulting from submitting a late application. (R307-415-5a(5))

I.D.4 Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted consistent with R307-415-7b (see also Provision I.E, Application Shield) and R307-415-5a(1)(c) (see also Provision I.D.2). (R307-415-7c(2))

I.E Application Shield.

If the permittee submits a timely and complete application for renewal, the permittee's failure to have an operating permit will not be a violation of R307-415, until the Executive Secretary takes final action on the permit renewal application. In such case, the terms and conditions of this permit shall remain in force until permit renewal or denial. This protection shall cease to apply if, subsequent to the completeness determination required pursuant to R307-415-7a(3), and as required by R307-415-5a(2), the applicant fails to submit by the deadline specified in writing by the Executive Secretary any additional information identified as being needed to process the application. (R307-415-7b(2))

I.F Severability.

In the event of a challenge to any portion of this permit, or if any portion of this permit is held invalid, the remaining permit conditions remain valid and in force. (R307-415-6a(5))

I.G Permit Fee.

I.G.1 The permittee shall pay an annual emission fee to the Executive Secretary consistent with R307-415-9. (R307-415-6a(7))

I.G.2 The emission fee shall be due on October 1 of each calendar year or 45 days after the source receives notice of the amount of the fee, whichever is later. (R307-415-9(4)(a))

I.H No Property Rights.

This permit does not convey any property rights of any sort, or any exclusive privilege. (R307-415-6a(6)(d))

I.I Revision Exception.

No permit revision shall be required, under any approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit. (R307-415-6a(8))

I.J Inspection and Entry.

- I.J.1 Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Executive Secretary or an authorized representative to perform any of the following:
- I.J.1.a Enter upon the permittee's premises where the source is located or emissions related activity is conducted, or where records are kept under the conditions of this permit. (R307-415-6c(2)(a))
- I.J.1.b Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit. (R307-415-6c(2)(b))
- I.J.1.c Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practice, or operation regulated or required under this permit. (R307-415-6c(2)(c))
- I.J.1.d Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with this permit or applicable requirements. (R307-415-6c(2)(d))
- I.J.2 Any claims of confidentiality made on the information obtained during an inspection shall be made pursuant to Utah Code Ann. Section 19-1-306. (R307-415-6c(2)(e))

I.K Certification.

Any application form, report, or compliance certification submitted pursuant to this permit shall contain certification as to its truth, accuracy, and completeness, by a responsible official as defined in R307-415-3. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. (R307-415-5d)

I.L Compliance Certification.

- I.L.1 Permittee shall submit to the Executive Secretary an annual compliance certification, certifying compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. This certification shall be submitted no later than the date shown under "Enforceable Dates and Timelines" at the front of this permit, and that date each year following until this permit expires. The certification shall include all the following (permittee may cross-reference this permit or previous reports): (R307-415-6c(5))
- I.L.1.a The identification of each term or condition of this permit that is the basis of the certification;
- I.L.1.b The identification of the methods or other means used by the permittee for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the monitoring and related recordkeeping and reporting requirements in this permit. If necessary, the permittee also shall identify any other material information that must be included in the certification to comply with section 113(c)(2) of the Act, which prohibits knowingly making a false certification or omitting material information;
- I.L.1.c The status of compliance with the terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Provision I.L.1.b. The certification shall identify each deviation and take it into account in the compliance

certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and

I.L.1.d Such other facts as the Executive Secretary may require to determine the compliance status.

I.L.2 The permittee shall also submit all compliance certifications to the EPA, Region VIII, at the following address or to such other address as may be required by the Executive Secretary: (R307-415-6c(5)(d))

Environmental Protection Agency, Region VIII
Office of Enforcement, Compliance and Environmental Justice
(mail code 8ENF)
1595 Wynkoop Street
Denver, CO 80202-1129

I.M Permit Shield.

I.M.1 Compliance with the provisions of this permit shall be deemed compliance with any applicable requirements as of the date of this permit, provided that:

I.M.1.a Such applicable requirements are included and are specifically identified in this permit, or (R307-415-6f(1)(a))

I.M.1.b Those requirements not applicable to the source are specifically identified and listed in this permit. (R307-415-6f(1)(b))

I.M.2 Nothing in this permit shall alter or affect any of the following:

I.M.2.a The emergency provisions of Utah Code Ann. Section 19-1-202 and Section 19-2-112, and the provisions of the CAA Section 303. (R307-415-6f(3)(a))

I.M.2.b The liability of the owner or operator of the source for any violation of applicable requirements under Utah Code Ann. Section 19-2-107(2)(g) and Section 19-2-110 prior to or at the time of issuance of this permit. (R307-415-6f(3)(b))

I.M.2.c The applicable requirements of the Acid Rain Program, consistent with the CAA Section 408(a). (R307-415-6f(3)(c))

I.M.2.d The ability of the Executive Secretary to obtain information from the source under Utah Code Ann. Section 19-2-120, and the ability of the EPA to obtain information from the source under the CAA Section 114. (R307-415-6f(3)(d))

I.N Emergency Provision.

I.N.1 An "emergency" is any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventive maintenance, careless or improper operation, or operator error. (R307-415-6g(1))

I.N.2 An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations if the affirmative defense is demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that:

- I.N.2.a An emergency occurred and the permittee can identify the causes of the emergency. (R307-415-6g(3)(a))
- I.N.2.b The permitted facility was at the time being properly operated. (R307-415-6g(3)(b))
- I.N.2.c During the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in this permit. (R307-415-6g(3)(c))
- I.N.2.d The permittee submitted notice of the emergency to the Executive Secretary within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. This notice fulfills the requirement of Provision I.S.2.c below. (R307-415-6g(3)(d))
- I.N.3 In any enforcement proceeding, the permittee seeking to establish the occurrence of an emergency has the burden of proof. (R307-415-6g(4))
- I.N.4 This emergency provision is in addition to any emergency or upset provision contained in any other section of this permit. (R307-415-6g(5))
- I.O **Operational Flexibility.**
- Operational flexibility is governed by R307-415-7d(1).
- I.P **Off-permit Changes.**
- Off-permit changes are governed by R307-415-7d(2).
- I.Q **Administrative Permit Amendments.**
- Administrative permit amendments are governed by R307-415-7e.
- I.R **Permit Modifications.**
- Permit modifications are governed by R307-415-7f.
- I.S **Records and Reporting.**
- I.S.1 Records.
- I.S.1.a The records of all required monitoring data and support information shall be retained by the permittee for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-charts or appropriate recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. (R307-415-6a(3)(b)(ii))
- I.S.1.b For all monitoring requirements described in Section II, Special Provisions, the source shall record the following information, where applicable: (R307-415-6a(3)(b)(i))
- I.S.1.b.1 The date, place as defined in this permit, and time of sampling or measurement.
- I.S.1.b.2 The date analyses were performed.

- I.S.1.b.3 The company or entity that performed the analyses.
- I.S.1.b.4 The analytical techniques or methods used.
- I.S.1.b.5 The results of such analyses.
- I.S.1.b.6 The operating conditions as existing at the time of sampling or measurement.
- I.S.1.c Additional record keeping requirements, if any, are described in Section II, Special Provisions.
- I.S.2 Reports.
- I.S.2.a Monitoring reports shall be submitted to the Executive Secretary every six months, or more frequently if specified in Section II. All instances of deviation from permit requirements shall be clearly identified in the reports. (R307-415-6a(3)(c)(i))
- I.S.2.b All reports submitted pursuant to Provision I.S.2.a shall be certified by a responsible official in accordance with Provision I.K of this permit. (R307-415-6a(3)(c)(i))
- I.S.2.c The Executive Secretary shall be notified promptly of any deviations from permit requirements including those attributable to upset conditions as defined in this permit, the probable cause of such deviations, and any corrective actions or preventative measures taken. Prompt, as used in this condition, shall be defined as written notification within the number of days shown under "Enforceable Dates and Timelines" at the front of this permit.. Deviations from permit requirements due to unavoidable breakdowns shall be reported in accordance with the provisions of R307-107. (R307-415-6a(3)(c)(ii))
- I.S.3 Notification Addresses.
- I.S.3.a All reports, notifications, or other submissions required by this permit to be submitted to the Executive Secretary are to be sent to the following address or to such other address as may be required by the Executive Secretary:
- Utah Division of Air Quality
P.O. Box 144820
Salt Lake City, UT 84114-4820
Phone: 801-536-4000
- I.S.3.a All reports, notifications or other submissions required by this permit to be submitted to the EPA should be sent to one of the following addresses or to such other address as may be required by the Executive Secretary:
- For annual compliance certifications:
- Environmental Protection Agency, Region VIII
Office of Enforcement, Compliance and Environmental Justice
(mail code 8ENF)
1595 Wynkoop Street
Denver, CO 80202-1129
- For reports, notifications, or other correspondence related to permit modifications, applications, etc.:

Environmental Protection Agency, Region VIII
Office of Partnerships & Regulatory Assistance Air & Radiation Program (mail code 8P-AR)
1595 Wynkoop Street
Denver, CO 80202-1129
Phone: 303-312-6440

I.T Reopening for Cause.

- I.T.1 A permit shall be reopened and revised under any of the following circumstances:
- I.T.1.a New applicable requirements become applicable to the permittee and there is a remaining permit term of three or more years. No such reopening is required if the effective date of the requirement is later than the date on which this permit is due to expire, unless the terms and conditions of this permit have been extended pursuant to R307-415-7c(3), application shield. (R307-415-7g(1)(a))
- I.T.1.b The Executive Secretary or EPA determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit. (R307-415-7g(1)(c))
- I.T.1.c EPA or the Executive Secretary determines that this permit must be revised or revoked to assure compliance with applicable requirements. (R307-415-7g(1)(d))
- I.T.1.d Additional applicable requirements are to become effective before the renewal date of this permit and are in conflict with existing permit conditions. (R307-415-7g(1)(e))
- I.T.2 Additional requirements, including excess emissions requirements, become applicable to a Title IV affected source under the Acid Rain Program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into this permit. (R307-415-7g(1)(b))
- I.T.3 Proceedings to reopen and issue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. (R307-415-7g(2))

I.U Inventory Requirements.

An emission inventory shall be submitted in accordance with the procedures of R307-150, Emission Inventories. (R307-150)

I.V Title IV and Other, More Stringent Requirements

Where an applicable requirement is more stringent than an applicable requirement of regulations promulgated under Title IV of the Act, Acid Deposition Control, both provisions shall be incorporated into this permit. (R307-415-6a(1)(b))

SECTION II: SPECIAL PROVISIONS

- II.A **Emission Unit(s) Permitted to Discharge Air Contaminants.**
(R307-415-4(3)(a) and R307-415-4(4))
- II.A.1 **Permitted Source**
Source-wide
- II.A.2 **B1: Boiler**
Pre-NSPS Natural Gas/Propane Fired Boiler used for plant heating and process steam, approximate rating 10.5 MM BTU/hr.
- II.A.3 **PW1: Pan Washer and Dryer**
Natural Gas/Propane Fired Heater, approximate rating 0.8 MM BTU/hr.
- II.A.4 **P1-3: Propane Storage Tanks**
Two 30,000 gallon liquid propane tanks and one 1,000 gallon propane vapor tank.
- II.A.5 **L1: Process Line #1 Oven**
Natural Gas/Propane Fired Oven. Approximate combined rating for the burners is 3.2 MM Btu/hr.
- II.A.6 **L2: Process Line #2 Oven**
Natural Gas/Propane Fired Oven. Approximate combined rating for the burners is 3.2 MM Btu/hr.
- II.A.7 **DP1-3: Three Diesel Powered Pumps**
Pumps are used intermittently as backup well water pumps or as emergency fire suppression pumps. Pumps are rated at approximately 0.38, 0.44, and 0.17 MMBtu/hr.
- II.A.8 **M1: Miscellaneous Equipment**
Miscellaneous equipment such as oil tanks (non NSPS), diesel oil tanks (non NSPS), refrigeration system, label printer, small sandblasting glove booth, etc.
- II.A.9 **SS: Storage Silos**
Six flour storage silos and one sugar silo, equipped with bin vents for the control of flour and sugar dust during transfer operations.
- II.A.10 **R1: Process Line #5 Radio Frequency Dryer**
Product passes from Process Line No. 5 Oven into Radio Frequency Dryer.
- II.A.11 **L3: Process Line #3 Oven**
Natural Gas/Propane Fired Oven. Approximate combined rating for the burners is 5.17 MM Btu/hr.
- II.A.12 **L5: Process Line #5 Oven**
Natural Gas/Propane Fired Oven. Approximate combined rating for the burners is 9.9 MM Btu/hr. There are two stacks, one for combustion emissions and one for product emissions that pass through a catalytic oxidizer.
- II.A.13 **L7: Process Line #7 Oven**
Natural Gas/Propane Fired Oven. Approximate combined rating for the burners is 5.3 MMBtu/hr.

II.B Requirements and Limitations

The following emission limitations, standards, and operational limitations apply to the permitted facility as indicated:

II.B.1 Conditions on permitted source (Source-wide).

II.B.1.a Condition:

The permittee shall comply with the applicable requirements for recycling and emission reduction for class I and class II refrigerants pursuant to 40 CFR 82, Subpart F - Recycling and Emissions Reduction. [Authority granted under 40 CFR 82.150(b); condition originated in 40 CFR Part 82 Subpart F].

II.B.1.a.1 Monitoring:

The permittee shall certify, in the annual compliance statement required in Section I of this permit, its compliance status with the requirements of 40 CFR 82, Subpart F.

II.B.1.a.2 Recordkeeping:

All records required in 40 CFR 82, Subpart F shall be maintained consistent with the requirements of Provision S.1 in Section I of this permit.

II.B.1.a.3 Reporting:

All reports required in 40 CFR 82, Subpart F shall be submitted as required. There are no additional reporting requirements except as outlined in Section I of this permit.

II.B.1.b Condition:

Natural gas consumption shall be no greater than 385 MM Scf per rolling 12-month period. [Authority granted under R307-401-8 [BACT]; condition originated in DAQE-620-01].

II.B.1.b.1 Monitoring:

Natural gas consumption shall be determined using billing statements from the previous twelve months. A rolling twelve month total of natural gas usage shall be calculated by the seventh day of each month using the previous twelve months data.

II.B.1.b.2 Recordkeeping:

Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.1.b.3 Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.1.c Condition:

Fuel oil consumption shall be no greater than 2300 gal/12 month-rolling period (for stationary equipment). [Authority granted under R307-401-8 [BACT]; condition originated in DAQE-620-01].

- II.B.1.c.1 Monitoring:**
- Fuel usage shall be determined each month using billing records, dip-stick measurements, or other appropriate methods. A rolling twelve month total of fuel usage shall be calculated by the seventh day of each month using the previous twelve months data.
- II.B.1.c.2 Recordkeeping:**
- Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.
- II.B.1.c.3 Reporting:**
- There are no reporting requirements for this provision except those specified in Section I of this permit.
- II.B.1.d Condition:**
- The permittee shall combust only #1 or #2 low sulfur fuel oils. [Authority granted under R307-401-8 [BACT]; condition originated in DAQE-620-01].
- II.B.1.d.1 Monitoring:**
- The record serves as monitoring.
- II.B.1.d.2 Recordkeeping:**
- Receipts showing the grade of fuel oil purchased shall be obtained from the vendor and maintained as records. Documentation from the fuel vendor shall also be maintained to demonstrate that #1 and #2 fuel oils contain 0.5 weight percent sulfur or less.
- II.B.1.d.3 Reporting:**
- There are no reporting requirements for this provision except those specified in Section I of this permit.
- II.B.1.e Condition:**
- VOC emissions shall be no greater than 161.5 tons per 12-month rolling period. [Authority granted under R307-401-8 [BACT]; condition originated in DAQE-620-01].
- II.B.1.e.1 Monitoring:**
- VOC emissions shall be calculated as a rolling 12-month total. Based on the seventh day of each month a new 12-month total shall be calculated using data from the previous 12 months. Plant-wide emissions shall be determined by the summation of VOC from the following sources as specified:
- (A) Line 3:
- (1) Oven 3 emissions (tpy) = VOC E.F. x tons of product x 1 ton/2000 lbs.
- VOC E.F. is the bread oven emissions factor derived from the USEPA Emissions Inventory Branch [Alternative Control Technology Document for Bakery Oven Emissions EPA 453/R-92-017, December 1992)] The equation is:
- VOC E.F.= 0.95Yi+0.195 ti - 0.51S-0.86ts+1.90, where:

VOC E.F. = pounds VOC per ton of baked bread
Yi = initial baker's percent of yeast
ti = total yeast action time in hours
S = final (spike) baker's percent of yeast
ts = spiking time in hours.

(2) Fugitive emissions = 1/9 x Oven 3 emissions.

(B) Line 7:

(1) Oven 7 emissions = VOC E.F. x tons of product x 1 ton/2000 lbs.

VOC E.F. is the bread oven emissions factor derived from the USEPA Emissions Inventory Branch [Alternative Control Technology Document for Bakery Oven Emissions EPA 453/R-92-017, December 1992]

The equation is:

VOC E.F. = $0.95Y_i + 0.195t_i - 0.51S - 0.86t_s + 1.90$, where:

VOC E.F. = pounds VOC per ton of baked bread
Yi = initial baker's percent of yeast
ti = total yeast action time in hours
S = final (spike) baker's percent of yeast
ts = spiking time in hours.

(2) Fugitive emissions = 1/9 x Oven 7 emissions.

(C) Line 5 :

(1) Oven 5 emissions = Oven 5 E.F. x tons of product x 1 ton/2000 lbs x 0.05,
where:

Oven 5 E.F. = 20.4 lb VOC/ton product (based on testing at several Pepperidge Farms facilities).

(2) Fugitive emissions = 1/9 x Oven 5 emissions.

(D) Combustion source VOC emissions = source fuel usage x VOC emissions factor x 1 ton/2000 lbs.

VOC emissions factors [USEPA, AP-42]:

Natural gas = 5.28 lb VOC/MM scf natural gas.

Diesel = 0.35 lb VOC/MM Btu

LPG/propane = 0.5 lb VOC/1000 gal.

II.B.1.e.2

Recordkeeping:

Results of monitoring shall be maintained in accordance with Provision I.S.1 of this permit.

II.B.1.e.3

Reporting:

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.2 **Process Line #3 Oven (L3).**

II.B.2.a **Condition:**

Visible emissions shall be no greater than 10 percent opacity. [Authority granted under R307-401-8 [BACT]; condition originated in DAQE-620-01].

II.B.2.a.1 **Monitoring:**

In lieu of monitoring via visible emission observations, the type of fuel used shall be monitored to demonstrate that only natural gas or propane is being combusted.

II.B.2.a.2 **Recordkeeping:**

The permittee shall keep records of all fuel types used.

II.B.2.a.3 **Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.3 **Process Line #5 Oven (L5).**

II.B.3.a **Condition:**

Emissions of VOC shall be no greater than 2.55 lb/hr from the catalytic oxidizer. [Authority granted under R307-401-8 [BACT]; condition originated in DAQE-620-01].

II.B.3.a.1 **Monitoring:**

(A) Stack testing shall be performed every 5 years based on the date of the last stack test. Tests shall be performed as follows:

(1) Notification: the Executive Secretary shall be notified at least 30 days prior to conducting any required emission testing. A source test protocol shall be submitted to DAQ when the testing notification is submitted to the Executive Secretary. The source test protocol shall be approved by the Executive Secretary prior to performing the test(s). The source test protocol shall outline the proposed test methodologies, stack to be tested, and procedures to be used. A pretest conference shall be held, if directed by the Executive Secretary.

(2) Sample Location: the emission point shall be designed to conform to the requirements of 40 CFR 60, Appendix A, Method 1, or other methods as approved by the Executive Secretary. An Occupational Safety and Health Administration (OSHA) or Mine Safety and Health Administration (MSHA) approved access shall be provided to the test location.

(3) Volumetric Flow Rate: 40 CFR 60, Appendix A, Method 2

(4) Volatile Organic Compounds (VOCs): 40 CFR 60, Appendix A, Method 18 or other method approved by the Executive Secretary.

(5) Calculations: to determine mass emission rates (lb/hr, etc.) the pollutant concentration as determined by the appropriate methods above shall be multiplied by the volumetric flow rate and any necessary conversion factors determined by the Executive Secretary, to give the results in the specified units of the emission limitation.

(6) The production rate during all compliance testing shall be no less than 90% of the maximum production achieved in the previous three (3) years.

(B) Operation conditions indicative of catalyst performance shall be monitored as follows:

(1) Production status in terms of normal production, start-up and shutdown, and malfunction conditions.

(i) Normal production is defined by periods of operation in which the oven conveyor is full of dough/product and the exhaust gases have reached equilibrium. Exhaust gases are at equilibrium when the oven has been full of dough/product for a period of two times the unit product residence time in the oven until the dough ceases to enter the oven. Periods of start-up and shut-down, and malfunction are excluded from normal production.

(ii) Start-up and shutdown is defined by the start or end of a production cycle in which the oven conveyor is not full of dough. (iii) Malfunction is defined by periods in which a malfunction of the oven, oxidizer, or monitoring system occurs which requires shutdown or maintenance.

(2) Production rate shall be monitored and used to determine residence time.

(3) During normal production, the catalyst inlet temperature shall be monitored and maintained at 699.4 degrees F or greater, and temperature rise across the catalyst shall be monitored and maintained at 55 degrees F or greater. Temperature rise shall be determined from catalyst inlet and outlet temperature measurements based on a 3-hour rolling average of data collected every ten minutes. Thermocouples permanently located at the catalyst inlet and outlet shall be used to measure inlet and outlet temperatures and shall be calibrated semi-annually.

(4) An excursion is defined as the temperature rise across the catalyst dropping to below 55 degrees Fahrenheit, or the inlet temperature dropping below 699.4 degrees Fahrenheit. When an excursion occurs, Pepperidge Farm will conduct an evaluation of production and operational procedures, which will include:

(i) A review for potential changes in product formulation, throughput, and air flow exhaust.

(ii) Inspection of the thermocouples and recalibration if necessary.

(5) If the evaluation results (4)(i) and (4)(ii) fail to explain and remedy the excursion, Pepperidge Farm will take one or more of the following corrective actions:

(i) Visually inspect the catalyst, clean the catalyst, and/or raise inlet temperature to re-establish temperature rise within the specified range. No further action will be required if the temperature rise returns to the specified minimum value or greater.

(ii) Replacement of the catalyst within 60 days. No further action will be required if the temperature rise returns to the specified minimum value or greater.

(iii) Perform a reference test method to demonstrate compliance per Section (A) above. If compliance is demonstrated at a different catalyst inlet temperature, then that value will be the new baseline for subsequent parametric monitoring.

II.B.3.a.2

Recordkeeping:

In addition to the recordkeeping requirement described in Provision I.S.1 of this permit:

- (a) The permittee shall maintain a file of all stack testing and all other information required by permit provision I.S.1.
- (b) Records of operation conditions indicative of catalyst performance shall be maintained including: production status, production rate, residence time, catalyst inlet temperatures, catalyst exit temperatures, temperature rise across the catalyst, performance evaluations, calibration checks, adjustments, and maintenance. Records shall be maintained in a permanent form suitable for inspection.
- (c) The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of Process Line #5 Oven; and any malfunction of the air pollution control equipment.
- (d) The permittee shall maintain a file of the occurrence and duration of any excursion, corrective actions taken, and any other supporting information required to be maintained under 40 CFR 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Instead of paper records, the permittee may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

II.B.3.a.3

Reporting:

- (a) The monitoring report required in Provision I.S.2 of this permit shall include, at a minimum, the following information, as applicable:
 - (i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken; (40 CFR 64.9(a)(2)(i))
 - (ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable). (40 CFR 64.9(a)(2)(ii))
- (b) The results of stack testing shall be submitted to the Executive Secretary within 60 days of completion of the testing. Reports shall clearly identify results as compared to permit limits and indicate compliance status.

II.B.3.b

Condition:

Visible emissions shall be no greater than 10 percent opacity. [Authority granted under R307-401-8 [BACT]; condition originated in DAQE-620-01].

II.B.3.b.1

Monitoring:

In lieu of monitoring via visible emission observations, the type of fuel used shall be monitored to demonstrate that only natural gas or propane is being combusted.

II.B.3.b.2

Recordkeeping:

The permittee shall keep records of all fuel types used.

- II.B.3.b.3 Reporting:**
- There are no reporting requirements for this provision except those specified in Section I of this permit.
- II.B.3.c Condition:**
- At all times, including periods of startup, shutdown, and malfunction, the permittee shall, to the extent practicable, maintain and operate the catalytic oxidizer in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Executive Secretary which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [Authority granted under R307-401-8(2); condition originated in DAQE-620-01].
- II.B.3.c.1 Monitoring:**
- Records required for this permit condition will serve as monitoring.
- II.B.3.c.2 Recordkeeping:**
- Permittee shall document activities performed to assure proper operation and maintenance. Records shall be maintained in accordance with Provision I.S.1 of this permit.
- II.B.3.c.3 Reporting:**
- There are no reporting requirements for this provision except those specified in Section I of this permit.
- II.B.4 Process Line #7 Oven (L7).**
- II.B.4.a Condition:**
- Visible emissions shall be no greater than 10 percent opacity. [Authority granted under R307-401-8 [BACT]; condition originated in DAQE-620-01].
- II.B.4.a.1 Monitoring:**
- In lieu of monitoring via visible emission observations, the type of fuel used shall be monitored to demonstrate that only natural gas or propane is being combusted.
- II.B.4.a.2 Recordkeeping:**
- The permittee shall keep records of all fuel types used.
- II.B.4.a.3 Reporting:**
- There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.5 **Conditions on Boiler (B1).**

II.B.5.a.1 **Monitoring:**

In lieu of monitoring via visible emission observations, the type of fuel used shall be monitored to demonstrate that only natural gas or propane is being combusted.

II.B.5.a.2 **Recordkeeping:**

The permittee shall keep records of all fuel types used.

II.B.5.a.3 **Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.6 **Pan Washer and Dryer (PW1).**

II.B.6.a **Condition:**

Visible emissions shall be no greater than 10 percent opacity. [Authority granted under R307-401-8 [BACT]; condition originated in DAQE-620-01].

II.B.6.a.1 **Monitoring:**

In lieu of monitoring via visible emission observations, the type of fuel used shall be monitored to demonstrate that only natural gas or propane is being combusted.

II.B.6.a.2 **Recordkeeping:**

The permittee shall keep records of all fuel types used.

II.B.6.a.3 **Reporting:**

There are no reporting requirements for this provision except those specified in Section I of this permit.

II.B.7 **Process Line #1 Oven (L1).**

II.B.7.a **Condition:**

Visible emissions shall be no greater than 10 percent opacity. [Authority granted under R307-401-8 [BACT]; condition originated in DAQE-620-01].

II.B.7.a.1 **Monitoring:**

In lieu of monitoring via visible emission observations, the type of fuel used shall be monitored to demonstrate that only natural gas or propane is being combusted.

II.B.7.a.2 **Recordkeeping:**

The permittee shall keep records of all fuel types used.

- II.B.7.a.3 **Reporting:**
- There are no reporting requirements for this provision except those specified in Section I of this permit.
- II.B.8 **Process Line #2 Oven (L2).**
- II.B.8.a Visible emissions shall be no greater than 10 percent opacity. [Authority granted under R307-401-8 [BACT]; condition originated in DAQE-620-01].
- II.B.8.a.1 **Monitoring:**
- In lieu of monitoring via visible emission observations, the type of fuel used shall be monitored to demonstrate that only natural gas or propane is being combusted.
- II.B.8.a.2 **Recordkeeping:**
- The permittee shall keep records of all fuel types used.
- II.B.8.a.3 **Reporting:**
- There are no reporting requirements for this provision except those specified in Section I of this permit.
- II.B.9 **Three Diesel Powered Pumps (DP1-3).**
- II.B.9.a **Condition:**
- Visible emissions shall be no greater than 20 percent opacity. [Authority granted under R307-401-8 [BACT]; condition originated in DAQE-620-01].
- II.B.9.a.1 **Monitoring:**
- When hours of operation for any individual pump exceeds 300 hours during a calendar year, an opacity observation shall be conducted on that pump in accordance with 40 CFR 60, Appendix A, Method 9.
- II.B.9.a.2 **Recordkeeping:**
- A log recording all hours of pump operation shall be maintained. The log shall include the results of required monitoring.
- II.B.9.a.3 **Reporting:**
- There are no reporting requirements for this provision except those specified in Section I of this permit.
- II.C **Emissions Trading**
(R307-415-6a(10))
- Not applicable to this source.
- II.D **Alternative Operating Scenarios.**
(R307-415-6a(9))
- Not applicable to this source.

II.E Source-specific Definitions.

The following definitions apply to the permittee. They include terms not defined in state or federal rules or clarify or expand on existing definitions.

SECTION III: PERMIT SHIELD

The following requirements have been determined to be not applicable to this source in accordance with Provision I.M, Permit Shield:

III.A. 40 CFR Part 60, Subpart Dc (Standards of Performance for New Stationary Sources)

This regulation is not applicable to the B1: Boiler for the following reason(s): the existing boiler is not subject to the requirements of 40 CFR 60, Subpart Dc due to date of installation. The boiler was installed in 1973, prior to the applicability date of June 9, 1989 [Last updated February 20, 2008]

SECTION IV: ACID RAIN PROVISIONS

IV.A **This source is not subject to Title IV. This section is not applicable.**

REVIEWER COMMENTS

This operating permit incorporates all applicable requirements contained in the following documents:

Incorporates	DAQE-620-01 dated July 27, 2001
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1. Comment on an item originating in DAQE-620-01 regarding Permitted Source
AO condition 17: Inventories and Testing Requirements, is included in Section I.U. of this permit. [Last updated February 20, 2008]
2. Comment on an item originating in regarding Permitted Source
AO condition 17: Inventories and Testing Requirements, is included in Section I.U. of this permit. [Last updated February 20, 2008]
3. Comment on an item originating in DAQE-620-01 regarding Permitted Source
AO condition 18: Unavoidable Breakdowns, is included in Section I.S.2.c of this permit. [Last updated February 20, 2008]
4. Comment on an item originating in regarding Permitted Source
AO condition 18: Unavoidable Breakdowns, is included in Section I.S.2.c of this permit. [Last updated February 20, 2008]
5. Comment on an item originating in AO conditions 12 B regarding Permitted Source
Opacity from Silos: The opacity limit on the silos, originating in the approval order, is not included in the operating permit. All silos are vented into secondary enclosure buildings. [Last updated February 20, 2008]
6. Comment on an item originating in regarding Permitted Source
Opacity from Silos: The opacity limit on the silos, originating in the approval order, is not included in the operating permit. All silos are vented into secondary enclosure buildings. [Last updated February 20, 2008]
7. Comment on an item originating in R 307-203 regarding Permitted Source
R 307-203: This rule requires a sulfur content less than 0.85 lbs/ MM gross Btu heat input for fuel oil. The requirement R 307-203 is replaced by the more stringent requirement to burn #1 or #2 low sulfur fuels which contain less than 0.5 percent weight sulfur, or less. [Last updated February 20, 2008]
8. Comment on an item originating in regarding Permitted Source
R 307-203: This rule requires a sulfur content less than 0.85 lbs/ MM gross Btu heat input for fuel oil. The requirement R 307-203 is replaced by the more stringent requirement to burn #1 or #2 low sulfur fuels which contain less than 0.5 percent weight sulfur, o [Last updated February 20, 2008]
9. Comment on an item originating in DAQE-620-01 regarding Permitted Source
Sitewide VOC limit: lines 1&2 have no process VOC emissions because yeast is not used for these products. Hence, there are no emissions factors for baking on these lines. Even so, VOC emissions from combustion are included in the calculations. [Last updated February 20, 2008]
10. Comment on an item originating in regarding Permitted Source
Sitewide VOC limit: lines 1&2 have no process VOC emissions because yeast is not used

for these products. Hence, there are no emissions factors for baking on these lines. Even so, VOC emissions from combustion are included in the calculations. [Last updated February 20, 2008]